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11 Attorneys for Defendants
ROBINHOOD FINANCIAL LLC;
12 ROBINHOOD MARKETS, INC.;
ROBINHOOD SECURITIES, LLC

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION
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18 JI KWON, individually and on behalf of all
19 others similarly situated,

20 Plaintiff,

21 v.

22 ROBINHOOD FINANCIAL LLC, and
23 ROBINHOOD SECURITIES, LLC,

24 Defendants.
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Case No. 4:20-cv-9328-YGR

STATEMENT OF NONOPPOSITION

The Hon. Yvonne Gonzalez Rogers

Date: April 13, 2021
Time: 2:00 p.m.
Courtroom: Room 1, 1301 Clay Street,
4th Floor, Oakland CA
94612

EDWARD LUPARELLO, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

ROBINHOOD FINANCIAL LLC,
ROBINHOOD SECURITIES, LLC, and
ROBINHOOD MARKETS, INC.

Defendants.

Case No. 4:20-cv-9328-YGR

Filed January 15, 2021

SARKHAN NABI, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ROBINHOOD FINANCIAL LLC, a
Delaware LLC, and ROBINHOOD
SECURITIES, LLC, a Delaware LLC,

Defendants.

Case No. 4:21-cv-00755-YGR

Filed January 29, 2021

ROBEL GHEBREHIWET, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

ROBINHOOD FINANCIAL LLC, a
Delaware corporation, ROBINHOOD
SECURITIES, LLC, a Delaware corporation,
and ROBINHOOD MARKETS, INC., a
Delaware corporation,

Defendants.

Case No. 3:21-cv-01739-JSC (N.D. Cal.)

Filed February 4, 2021

1 Defendants Robinhood Financial LLC, Robinhood Securities, LLC, and Robinhood
 2 Markets, Inc.¹, (“Defendants”) hereby submit this Statement of Nonopposition to the (1) Motion to
 3 Consolidate the above-captioned actions² (the “Robinhood Actions”); (2) Motion to Appoint Lead
 4 Plaintiff; and (3) Motion to Appoint Lead Counsel, (collectively, the “Motions”) filed by Plaintiff
 5 Ji Kwon (“Kwon”) (Dkt. 30).

6 1. *Motion to Consolidate.* Defendants do not oppose Kwon’s motion to consolidate
 7 the Robinhood Actions pursuant to Rule 42(a)(2) of the Federal Rules of Civil Procedure. This
 8 nonopposition is not an admission that class certification of the Robinhood Actions is appropriate
 9 or that the factual or legal assertions in the complaints or the motion are true. Defendants reserve
 10 all rights and do not waive any arguments otherwise available to them.

11 2. *Motion to Appoint Lead Plaintiff.* Defendants take no position on the motion to
 12 appoint Kwon as lead plaintiff in the Robinhood Actions.

13 3. *Motion to Appoint Lead Counsel.* Defendants take no position on the motion to
 14 appoint Ahdoot & Wolfson, PC, Bursor & Fisher, P.A., and Liddle & Dubin, P.C. as lead counsel
 15 for plaintiffs in the Robinhood Actions.

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 25 ¹ Robinhood Markets, Inc., is a named defendant in *Luparello vs. Robinhood, et al.*, No. 4:21-cv-
 26 00415-YGR (N.D. Cal.) (filed Jan. 15, 2021) and *Ghebrehiwet vs. Robinhood, et al.*, No. 3:21-cv-
 01739-JSC (N.D. Cal.) (filed Feb. 4, 2021), only.

27 ² Since the filing of the Motions, *Ghebrehiwet vs. Robinhood, et al.*, No. 3:21-cv-01739-JSC (N.D.
 28 Cal.) (filed Feb. 4, 2021) was transferred from the Southern District of California on March 11,
 2021 pursuant to 28 U.S.C. § 1404.

1 Dated: March 22, 2021

FARELLA BRAUN + MARTEL LLP

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3 By:


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